

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MICHAEL PATRICK SIANOTM

Plaintiff,

v.

M&T BANK,
PARKER McCAY P.A. LAW OFFICES et al.
and all Unknown Parties

Defendant.

Civil Action No.: 3:20-cv-12827-MAS-DEA

**NOTICE OF MOTION TO DISMISS
PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that, upon the Motion of Defendant M&T Bank ("M&T Bank") and all pleadings and proceedings heretofore had herein, the law firm of Parker Ibrahim & Berg LLP, will move before the Honorable Michael A. Shipp, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse located at 402 East State Street, Room 5W, Trenton, New Jersey, 08608, on December 7, 2020, at 10:00 a.m., or as soon thereafter as M&T Bank may be heard, for an Order dismissing the Complaint of Plaintiff Michael Patrick SianoTM, with prejudice and in its entirety, pursuant to Fed. R. Civ. P. Rule 12(b)(1), and for such other and further relief as the Court deems just and proper.

Oral argument is requested.

~ *Signature on following page* ~

Dated: Somerset, New Jersey
November 3, 2020

PARKER IBRAHIM & BERG LLP
Attorneys for Defendant,
M&T Bank

/s/ James P. Berg _____

James P. Berg, Esq.
Daniel A. Schleifstein, Esq.
270 Davidson Avenue
Somerset, New Jersey 08873
Telephone: (908) 725-9700
Facsimile: (908) 333-6230
Email: james.berg@piblaw.com